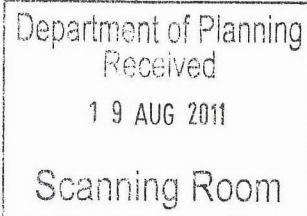
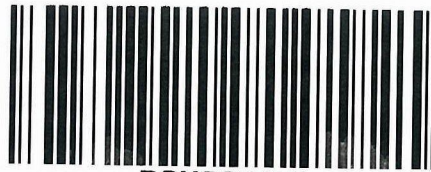


Contact: Steve Roseland
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11 August 2011



PCU025156

Ms Amy Watson
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Dear Ms Watson

RE: Redevelopment of the Former Allied Mills site for the purposes of a mixed use residential, commercial and retail development

Thank you for the opportunity to comment on the proposed mixed use residential, commercial and retail development at the Former Allied Mills site being assessed under Part 3A of the *Environmental Planning and Assessment Act 1979*. The following submission outlines the significant concerns Leichhardt Council has with regard to the proposal.

A. Affordable Housing

Leichhardt Council's Affordable Housing Strategy has identified a chronic shortage of affordable housing within the inner west region. Further, estimates provided by the NSW Centre for Affordable Housing indicate that only seventy-two (72) dwellings or 3% of the total National Rental Assistance Scheme Round 1 and Round 2 allocations for NSW have been constructed in 'inner ring' suburbs of Sydney.

Despite the affordable housing crisis the proposal's Concept Plan has not identified the provision of any affordable housing within the development. This represents a missed opportunity that Leichhardt Council considers unacceptable.

Both Marrickville and Ashfield Councils, along with Leichhardt, have been working through the Inner City Mayors Forum working group on Affordable Housing to develop a regional solution to the need for more affordable housing within Sydney's inner areas and to lobby the State government to better achieve the desired outcomes. The inner city councils within this group have committed to an agenda of planning and policy reform that will increase the supply of affordable housing in these areas.

Facilitating that additional affordable housing supply is best, and most easily achieved, on larger sites as part of larger projects such as this proposal. Not seeking the provision of affordable housing as part of the

IMPORTANT

This letter contains important information. If you do not understand it please ask a relative or friend to translate it or come to Council and discuss the letter with Council's staff using the Telephone Interpreter Service.

English

IMPORTANTE

Questa lettera contiene delle informazioni importanti. Se non capisce il contenuto è pregata di chiedere aiuto ad un parente o un amico, oppure La Invitiamo di venire in prersona al Municipio a parlarne con un nostro implegato, utilizzando il Servizio Interprete Telefonico.

Italian

IMPORTANTE

Esta carta contiene información importante. Si usted no la entiende, pídale a un familiar o a un amigo que se la traduzca, o venga a la Oficina de la Municipalidad y hable acerca de la misma con el personal de la oficina a través del Servicio Telefónico de Intérpretes.

Spanish

TIN QUAN TRỌNG

Tin tức trong thư này rất quan trọng. Nếu bạn không hiểu, hãy nhờ thân nhân hoặc bạn bè dịch cho bạn nghe hoặc tới văn phòng Hội Đồng Thành Phố để thảo luận với nhân viên qua dịch vụ thông ngôn điện thoại.

Vietnamese

ΠΡΟΣΟΧΗ

Το γράμμα αυτό περιέχει σπουδαίες πληροφορίες. Αν δεν το καταλαβαίνετε, παρακαλέστε ένα συγγενή ή φίλο να σας το μεταφράσει, ή ελάτε στο Δημαρχείο και συζητείστε το γράμμα με το προσωπικό του Δημαρχείου χρησιμοποιώντας την Τηλεφωνική Υπηρεσία Διερμηνέων.

Greek

重要信息

此信包含重要內容。若有不明白之處，可請親戚或朋友幫助翻譯。或請到市政會來，通過電話傳譯服務與市政會人員討論信的內容。

Chinese

concept plan is considered to be a lost opportunity, not only for the provision of affordable housing within Marrickville and Ashfield but across the region as a whole.

B. Transport considerations

Traffic Generation and Distribution

It can be anticipated that the development will generate approximately 3,000 vehicle movements per day, with roughly 10% of those movements occurring during the peak periods. The applicant's projections indicate an expected 226 and 289 car trips per hour for the AM and PM peak periods respectively.

The development's traffic analysis has not extended to Leichhardt; however the increased traffic on Old Canterbury Road (north) is estimated to increase by some 64 cars per hour in the PM peak (including traffic associated with the proposed McGill Street Precinct). There is no analysis presented which distributes this traffic to a finer grain to determine the likely volumes on Brown, Hathern and Tebbutt Street in Leichhardt. However any increase on this route is of concern as the Tebbutt Street/Hathern Street intersection is considered one of Leichhardt's most dangerous intersections.

The Brown/Hathern/Tebbutt Street corridor is a major link between Marrickville and Leichhardt, and will experience significantly increased pedestrian volumes upon completion of the nearby Taverner's Hill Light Rail stop. In combination with this, any additional traffic generated by the development along this corridor is likely to have a detrimental impact on the adjacent area's safety. The corridor is recognised as a road safety concern for Leichhardt Council with 25 accidents, including 1 fatality, being recorded in the past 5 years.

Additionally, the Inner West Light Rail Extension is likely to require substantial bridge works when the Brown Street Bridge (over Parramatta Road) is raised. Consequently, traffic associated with both the Summer Hills Flour Mills and McGill Street precinct is likely to divert to other routes during this period. No assessment of the impact of this diversion is provided.

The most critical traffic impact generated by the development will be the increased delays likely to be experienced at the Old Canterbury Road/Railway Terrace intersection. This intersection currently operates at a level of service "D" during the PM peak period, with the cumulative effect of the two developments (Summer Hill Flour Mills and McGill Street Precinct) this intersection will reach saturation.

A natural consequence of the saturation of a specific intersection is the diversion of traffic to other routes. Care should be taken to ensure that all

adjacent residential streets are protected from resultant through-traffic filtration.

Addressing the GreenWay and Light Rail Extension

The site is immediately adjacent to the Lewisham West Light Rail Stop and the GreenWay. In order to capitalise on this location the applicant has proposed the provision of pedestrian and cycle links to both of these facilities. In addition to this it is essential that the development address the general design principles and philosophy of the GreenWay, as follows:

- The development should address the Greenway as an active frontage resulting in substantial visual and environmental benefits, as well as being an active transport corridor. To this end it would be beneficial for the development to design its internal spaces (as well as its pedestrian and cycle circulation) to ensure it relates to the GreenWay both physically and visually.
- The developments landscape plans should include areas of open space designed to provide sympathetic linkages to, and integration with, the Greenway. These linkages should be physical, visual and environmental.
- Safe, permanent public access should be ensured (24 hours per day, 7 days per week) across the site to the GreenWay.
- New buildings should be designed to create new, and enhance existing, view corridors both to and through the Greenway
- Overlooking of the Greenway and light rail by the new development is to be encouraged to increase passive surveillance.
- The development should use materials and colours which enhance the visual amenity of the Greenway.
- Any furniture/structures adjoining the Greenway should be designed to complement both the Greenway's visual and philosophical concepts. In accordance with the sustainability philosophies of the Greenway all timber structures associated with adjoining spaces (including fencing, barriers and furniture) should use materials from verifiable sustainable sources and any heavy duty plastic furniture/structures should use recycled products.
- The development should endeavour to embrace sustainability philosophies, aiming to achieve a 4 green star minimum rating.

- The development should demonstrate best practise WSUD (eg swales, recycled water, rain water tanks, retention basins, artificial wetlands).
- Landscape plans should ensure that they incorporate the planting of locally indigenous native species in areas adjacent to the Greenway. Such landscaping should be designed to provide opportunities for compatible and appropriately varied habitats. The selection of appropriate species may be guided through the Greenway's documentation "Bushcare Management Plan". The landscape plan should also reflect and complement the flora of adjacent portions of the Greenway including both duplication of existing vegetation and companion planting.
- The development should be designed to ensure that it is sensitive to the needs of the fauna of the Greenway including:
 - Provision of lighting which minimises lighting impacts on nocturnal fauna and the Greenway generally
 - Reinforcement of permeability between the Greenway and the built environment for local fauna, wherever practical (eg raised footpath/cycleway sections and appropriate fencing at appropriate locations)
- On-site, and adjacent, wayfinding & information signage should be in accordance with the signage convention established for the Greenway/Light Rail Corridor, including (where possible) Greenway branding and logo.
- Opportunities should be provided for street activation and/or public art and animation, particularly in the vicinity of the light rail stops. This may include (but should not be limited to) public art, community meeting places, community celebrations and where appropriate, cafes, convenience stores adjacent light rail stops. Community spaces should facilitate community events and other elements supporting social cohesion.
- All formal spaces should generally be designed as fully accessible, multi-function areas suitable for adaptation to the varying needs of the community.
- Due to the sites proximity to the GreenWay and the likely user demand that it will generate, consideration should be given to the provision of either a one-off contribution or an on-going levy toward the GreenWay's up-keep.

General transport matters

- A detailed construction traffic management plan should be provided.

- While the transport assessment refers to the inclusion of bicycle and car share parking no details are currently provided in relation to quantity or location of these facilities.
- To encourage residents to use the heavy rail system, via Lewisham Station and Summer Hill stations, pedestrian network improvements and a wayfinding scheme should be introduced between the site and the station.
- The possibility of a development-based, self-managed car pooling scheme should be explored.
- As no details of the commercial and retail uses are provided it is difficult to accurately assess the likely visitor parking demand.

C. Open Space considerations

The proposal provides inadequate open space to meet the needs of new and existing residents. This will place even more pressure on existing open space areas provided by Ashfield, Marrickville and Leichhardt Councils. Compared to other local authorities, Ashfield and Marrickville Councils have the lowest provision of open space within inner Sydney, demonstrated by the following:

- Ashfield LGA at 1.2ha/1000 people
- Marrickville LGA at 1.5 ha/1000 people
- Burwood LGA at 1.2ha/1000 people
- Leichhardt LGA at 1.65 ha /1,000 people
- Waverley LGA at 1.80 ha / 1,000 people
- Sydney City LGA at 2.36 ha / 1,000 people
- North Sydney LGA at 2.60 ha / 1,000 people
- Strathfield LGA at 3.8 ha / 1,000 people
- Canada Bay LGA at 3.87 ha / 1,000 people

The significant deficiency in open space within both Ashfield and Marrickville Councils warrants a further review of this proposal to ensure the land set aside for open space is adequate and meets the needs of not only the future residents of this redevelopment but existing residents across the wider inner west sub region.

Leichhardt Council has conducted an audit of all existing open space and recreational facilities, programs and services within its municipality. As a result of these studies Council has identified the need to work with the managers and owners of open space and recreational land to help resolve current and likely future shortages in open space for both passive recreational pursuits and sporting activities, not only within Leichhardt Local Government Area (LGA) but across the region.

D. Land use considerations

The proposal represents an unacceptable loss of employment lands on the site. This loss cannot be viewed in isolation. Rather the proposal contributes to the proliferation of mixed use developments replacing

valuable employment lands throughout the inner west. The cumulative loss of employment lands is substantial as most of these 'mixed use' developments – including the Allied Mill proposal – contain minimal employment generating uses and floor space. Yet the NSW Government's own *draft Inner West Sub-regional Strategy* anticipates the continued strong demand for employment lands across the region. While recognising the changing nature of the industrial land use in the area due to the decline in traditional manufacturing, the Strategy also identified land which should be retained for industrial purposes to ensure the future health and viability of local businesses and the economy in the face of competing pressures on the use of these lands due to increasing property values and demand for residential development. The Former Allied Mills site has been identified as one of those key sites for retention.

The further loss of industrial lands as part of this proposal will contribute to the overall decline of land within the inner areas of metropolitan Sydney available to accommodate a growing, sustainable local and regional economy.

As part of the preparation of the Ashfield Urban Planning Draft Strategy 2010 this site should be identified for further examination, looking at the possibility of allowing a wider range of industrial uses on the property more in keeping with its current zoning whilst recognising the shift in demand for industrial land towards more creative industries in the arts, technology, production and design sectors.

The draft Marrickville Local Environmental Plan (dMLEP) 2010 proposes to zone the land covered by the proposed development within Marrickville Council Light Industrial (IN2). This is consistent with the current zoning of the property and prohibits the land uses proposed by this plan.

E. Urban Design comments

The following critique of urban design considerations is made on the basis of the information provided in the Environmental Assessment.

Built form

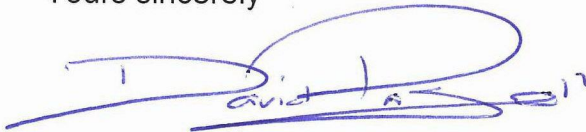
- The conversion of the concrete silos for residential use is supported to ensure that industrial elements of the existing built form on the site are preserved. This would also ensure these structures do not contribute to any additional visual impacts upon the local streetscapes and vistas across the site. The increase in height of these silos converted to residential use that is proposed as part of the plan is considered to be excessive and unnecessary and will not contribute any further quantifiable benefits to the overall development, the future residents or existing local

community. It also has the potential to have a negative impact upon the amenity of the open space areas to be provided as part of the Greenway project.

- Overshadowing of the Greenway by new developments should to be avoided, particularly during the winter months.
- When designing the new residential properties care should be taken to minimise their impact on the privacy of existing neighbouring residential dwellings.
- All buildings should be designed to minimise the impact of noise, vibration, lighting and privacy issues associated with the adjacent light rail activities.
- New buildings should be set back a minimum of 10 metres from the Greenway, to minimise overshadowing, provide adequate open space buffers to permit easy access between new structures and the Greenway. Buildings should also be stepped back to ensure that a "human scale" is maintained immediately adjacent to the Greenway.

Should you wish to further discuss this submission please contact Steve Roseland, Senior Strategic Planner on 9367 9257 or email steve@lmc.nsw.gov.au.

Yours sincerely



David Parsell
ACTING MANAGER ENVIRONMENT & URBAN PLANNING